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v.

UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA, Case No.: 3:15-CR-00438-JO

> Plaintiff, **GOVERNMENT'S MOTION**

TO CORRECT ITS MOTION FOR NEW FARETTA HEARING,

> **NEW TRIAL DATE, AND** REVISED CONDITIONS OF

WINSTON SHROUT, RELEASE

Defendant.

The United States of America, by and through Billy J. Williams, United States Attorney for the District of Oregon, and Stuart A. Wexler and Ryan R. Raybould, Trial Attorneys, Tax Division, hereby moves to correct its Motion for New Faretta Hearing, New Trial Date, and Revised Conditions of Release, filed on March 28, 2016. (Doc. 24.) The March 28 Motion indicated "a review of wssic.com on March 28, 2016, revealed that seminar recordings and fictitious instrument templates are still for sale through the website." (Doc. 24 at 7.) An Attachment A, containing screenshots from wssic.com showing these items for sale, was to have accompanied the March 28 Motion (Doc. 24 at 7) but was inadvertently omitted from the government's filing. The Attachment A is now attached to this filing.

DATED this 31st day of March, 2016.

Respectfully submitted,

BILLY J. WILLIAMS United States Attorney

/s/ Stuart A. Wexler STUART A. WEXLER RYAN R. RAYBOULD Trial Attorneys, Tax Division (202) 305-3167